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AUG 13 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JODIE L. KELLEY

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August 13, 2001

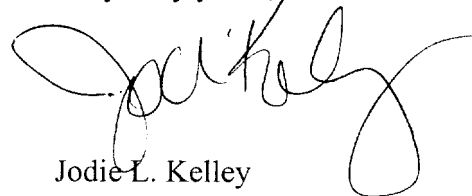
Magalie R. Salas, Esq.
Federal Communications Commission
Office of the Secretary
The Portals
445 12th St. S.W.
Room TWB 204
Washington, D.C. 20554Re: CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

Enclosed for filing please find an original and three copies of the "Objections of WorldCom to Verizon Virginia Inc.'s Seventh Set of Discovery to WorldCom." An additional eight copies have been provided in a separate envelope to be delivered to the arbitrator. Finally, an extra copy is enclosed to be file-stamped and returned.

If you have any questions, please do not hesitate to call me at 202-639-6058. Thank you very much for your assistance with this matter.

Very truly yours,



Jodie L. Kelley

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List ABCDE

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AUG 13 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
Petition of WorldCom, Inc. Pursuant)	
to Section 252(e)(5) of the)	
Communications Act for Expedited)	
Preemption of the Jurisdiction of the)	CC Docket No. 00-218
Virginia State Corporation Commission)	
Regarding Interconnection Disputes)	
with Verizon Virginia Inc., and for)	
Expedited Arbitration)	
)	
In the Matter of)	
Petition of Cox Virginia Telecom, Inc.)	
Pursuant to Section 252(e)(5) of the)	
Communications Act for Preemption)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State)	
Corporation Commission Regarding)	
Interconnection Disputes with Verizon)	
Virginia Inc. and for Arbitration)	
)	
In the Matter of)	
Petition of AT&T Communications of)	
Virginia Inc., Pursuant to Section 252(e)(5))	CC Docket No. 00-251
of the Communications Act for Preemption)	
of the Jurisdiction of the Virginia)	
Corporation Commission Regarding)	
Interconnection Disputes With Verizon)	
Virginia Inc.)	

**OBJECTIONS OF WORLDCOM TO
VERIZON VIRGINIA INC.'S SEVENTH SET
OF DISCOVERY TO WORLDCOM**

WorldCom, Inc. respectfully submits its objections to Verizon Virginia, Inc.'s Seventh Set of Discovery. Set out below are Verizon's requests, followed by WorldCom's objections. As a general matter, Verizon has sought discovery of a broad range of WorldCom cost and network data. WorldCom objects to each and every such discovery request on the ground that the costs to be set in this proceeding must comply with this Commission's TELRIC methodology, not WorldCom's (or any particular company's) actual costs and network. What needs to be modeled is the cost of serving Verizon Virginia's demand and territory, consistent with TELRIC cost principles.

WorldCom further notes that Verizon sought substantially similar information in a prior request – to which WorldCom objected. To the extent Verizon seeks the same information yet again, its discovery is objectionable for the further reason that it is repetitive, vexatious and harassing.

OBJECTIONS TO INDIVIDUAL REQUESTS

VII-15. On or about page 4 of Mr. Lee's direct testimony, filed on July 31, 2001, he discusses projection lives. Please provide by plant account, in further detail than provided in WorldCom's annual report, the depreciation (projection) lives that:

- (a) WorldCom uses to depreciate its plant and equipment;
- (b) WorldCom uses to depreciate its fixed wireless equipment;
- (c) WorldCom or any affiliates use to depreciate cable television plant and equipment; and
- (d) WorldCom affiliate, formerly TCG, uses to depreciate its plant and equipment.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

VII-16. On or about page 6 of Mr. Lee's direct testimony, filed on July 31, 2001, he states that the depreciation reserve is an indicator of the depreciation process. Please provide WorldCom's depreciation reserve percentages for the years 1990 through 2000 comparable to the chart shown on Attachment 1, page 1 of Mr. Lee's testimony.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

IIV-17. Please describe and identify, by location, any and all switches and cable routes owned or operated by WorldCom or any of its affiliates, in Virginia.

RESPONSE OF WORLD.COM:

WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

VII-21. Please provide copies of WorldCom's vendor contracts for switches that WorldCom has purchased for its Virginia operations over the last five years, as well as a list of vendors that have sold switches to WorldCom over the last five years. For each of the contracts, identify the discount that WorldCom received and the type of switch purchased. For each of the switches that WorldCom has purchased over the last five years for its Virginia operations, identify what types of upgrades and switch replacements WorldCom has performed, and how often these have occurred.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

VII-22. For each of the switches that WorldCom has purchased over the last five years for its Virginia operations, identify what types of upgrades and switch replacements WorldCom has performed, and how often these have occurred.

RESPONSE OF WORLDCOM:

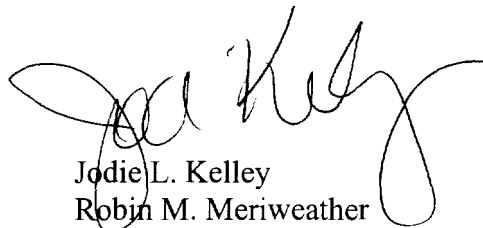
WorldCom objects to this interrogatory on the grounds that it is overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

VII-23. For each of the switches that WorldCom has installed in Virginia over the last five years, provide the following: (a) the date the switch was installed, (b) the location where the switch was installed, (c) the name of the switch manufacturer and model number, (d) the number of equipped lines (specifying the type of line, GR-303, TR-008, analog or other); (e) the price paid for the switch, and (f) the total costs of installing the switch, including all costs of engineering, furnishing, and installation.

RESPONSE OF WORLDCOM:

WorldCom objects to this interrogatory on the grounds that it is vague and overly broad. Further, WorldCom objects to this interrogatory on the grounds that the information sought is not relevant to any issue in this arbitration and not otherwise designed to lead to the discovery of admissible evidence.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jodie L. Kelley". The signature is fluid and cursive, with a large loop at the end.

Jodie L. Kelley
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CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the “Objections of WorldCom to Verizon Virginia Inc.’s Seventh Set of Discovery to WorldCom” were delivered this 13th day of August, 2001, by federal express and regular mail to:

Karen Zacharia
David Hall
Verizon-Virginia, Inc.
1320 North Courthouse Road, 8th Floor
Arlington, VA 22201
** By Federal Express*

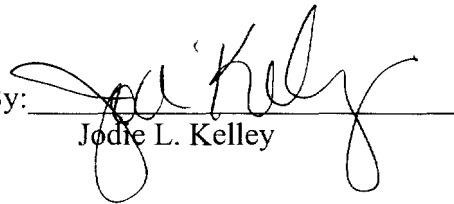
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By: 
Jodie L. Kelley